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Attorneys for Defendant

Tesla Motors, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LYNN THOMPSON,

Plaintiff,

vs.

TESLA MOTORS, INC.; ONQGLOBAL,
INC.; DOES 1-50,

Defendants.

Case No. 3:21-cv-00238-HDM-CSD

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S MOTION
FOR LEAVE TO FILE FIRST
AMENDED COMPLAINT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Lynn Thompson ("Plaintiff"), through his counsel HKM Employment Attorneys, LLP, Defendant Tesla Motors, Inc. ("Tesla"), through its counsel Jackson Lewis P.C., and Defendant OnQ Global, Inc. ("OnQ") (collectively, "Defendants"), that Defendants shall have an extension of time up to and including Thursday, January 5, 2023, in which to file a response to Plaintiff's Motion for Leave to File First Amended Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed his Motion for Leave to File First Amended Complaint on December 5, 2022, seeking to add an additional cause of action under Section 11(c) of the OSH Act of 1970. ECF No. 78.

2. Defendants are preparing their respective responses to Plaintiff's Motion. However, the press of other matters, including multiple depositions and emergency motion practice, have delayed Tesla's counsel's preparation of the opposition and as such, additional time is necessary. Counsel for Tesla also needs additional time to confer with Tesla's representatives regarding

1 Plaintiff's Motion and Tesla's opposition thereto. OnQ seeks an extension for the same reasons.

2 3. This is the first request for an extension of time for Defendants to file a response to
3 Plaintiff's Motion for Leave to File First Amended Complaint.

4 4. This request is made in good faith and not for the purpose of delay.

5 5. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect
6 of or be construed as waiving any claim or defense held by any party hereto.

7 DATED this 16th day of December, 2022.

8 HKM EMPLOYMENT ATTORNEYS, LLP JACKSON LEWIS P.C.

9
10 /s/ Jenny L. Foley
11 JENNY L. FOLEY, PhD., ESQ.
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13 *Attorney for Plaintiff*
14 *Lynn Thompson*

/s/ Kyle J. Hoyt
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17 /s/ Wade Beavers
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20 *Attorneys for Defendant*
21 *OnQ Global, Inc.*

ORDER

22 IT IS SO ORDERED:

23 

24 United States Magistrate Judge

25 Dated: December 19, 2022

26 4855-1065-9140, v. 1